

April 27, 2011

Mr. Mark Margerum
Project Manager
Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333-0017

Subject: Saddleback Ridge Wind Project, DEP #L-25137-24-A-N, #L-25137-TG-B-N response to

comments from public meeting and April 13, 2011 email from Mark Margerum.

## Dear Mark:

I am writing to respond to comments regarding groundwater, fire hazard, and cumulative visual impacts from significant scenic resources that were made at the Maine Department of Environmental Protection's (DEP's) public meeting on the Saddleback Ridge Wind Project (Project) on March 10, 2011, as repeated in a subsequent email from Mark Margerum of Maine DEP on April 13, 2011.

Groundwater: A couple of people expressed concern that blasting might negatively affect the groundwater in their wells. Groundwater protection was addressed in our original Site Law application materials in Section 15 (Groundwater), and we also included a letter (attached again for reference) from industrial seismologist Richard Groll in Section 20 (Blasting) which addressed the effects of blasting on groundwater and specifically on wells in the area near the project. Mr. Groll reviewed a preliminary blasting plan for the project, along with the locations of local residences and the areas where blasting is expected to occur and concluded that "There is no reason to believe that the blasting activity at the Saddleback Ridge Wind Project will disturb the rock structure or composition in a manner that would result in the diminution of the quality or quantity of local drinking water supplies." Mr. Groll also notes that "The proposed blasting operations at this site will not cause damage to the surrounding structures or water wells. The scale of blasting required at this site is commonly employed within 50 feet of occupied dwellings and working water supplies without causing damage." Based on Mr. Groll's assessment, we feel that the Project will have no impact on local drinking water wells; nevertheless, to address these concerns we will offer both pre- and post-construction water well tests to all residences within 3,500 feet of blasting activity. The pre-construction well testing will be incorporated into the pre-blast survey. A detailed spill prevention and control plan will be submitted to the department prior to operation.

<u>Fire hazard</u>: A few commenters raised questions about the fire risk that an operating wind project might pose. According to General Electric (GE), who makes the turbines we are proposing to use for this Project, there have been only 3 confirmed fires among the 16,000 1.5 MW and 2.5 MW wind turbines in GE's operating fleet, and none resulted in significant fires that spread outside the turbine area. All of these fires occurred on older 1.5 MW or earlier turbine designs, and GE made design modifications accordingly. There have been no reported fires on the 2.5-2.75 MW turbine models that are proposed for Saddleback Ridge Wind. GE recommends proper maintenance as the best way to avoid fires. GE representatives will provide maintenance work on the turbines while they are under warranty, and we will continue to follow proper maintenance protocols after the warranty period has expired. Furthermore, the turbines will be remotely



monitored 24/7, and alarm sensors in the turbine will alert monitoring technicians to operating problems, resulting in a callout to a local technician. We plan to coordinate with the local fire departments in East Dixfield, Dixfield, and Carthage to provide a quick, coordinated response in the highly unlikely event of a turbine caused fire. The fire department would not attempt to extinguish a turbine fire at the height of the tower, since these are as short-lived as they are rare. Rather, the fire department would concentrate on containing any fire that may occur in the immediate area around the base of the turbine.

<u>Cumulative Visual Impact</u>: The question was raised whether there would be visibility of any other pending, permitted or operating wind projects from scenic resources of state or national significance within the 8-mile viewshed of the Saddleback Ridge Wind Project. The only other pending, permitted or operating projects that we are aware of within a 16-mile radius of the Project are the Record Hill project (permitted and partially constructed) and the Spruce Mountain Project (permitted and currently under appeal). There have been press reports about a potential First Wind project in the Rumford/Roxbury area, but we are not aware of any permit application having been filed on that project. Similarly, there is a project under development by Patriot for Colonel Holman Mountain in Dixfield and Canton Mountain in Canton, but both are in earlier development stages and no applications have been filed.

To evaluate the cumulative impact of wind projects on scenic resources of state or national significance, we had our visual expert prepare a viewshed analysis of the Record Hill, Spruce Mountain, and Saddleback Ridge Wind Projects (see attached maps prepared by Terrence J. DeWan & Associates). Map A shows the viewshed analysis based on the more conservative topography data only while Map B shows the viewshed analysis of the Saddleback Ridge and the Spruce Mountain Projects based on vegetative landcover data (the Record Hill vegetative landcover viewshed data is not available) Halfmoon Pond is the only scenic resource of state or national significance that is located within eight miles of the Saddleback Ridge Wind Project and one or more other projects. From Halfmoon Pond, tips of 6 Saddleback turbines may be visible above the treeline, but there will not be any visibility of the Record Hill turbines due to intervening topography.

Please let me know if you have any further questions.

Sincerely,

Andy Novey Project Manager